



# Minnesota Pollution Control Agency

August 30, 1995

**CERTIFIED MAIL NO. Z 047 092 828**  
**RETURN RECEIPT REQUESTED**

**RECEIVED**

SEP 05 1995

AIR  
U.S. EPA, REGION V

Mr. Donald R. Madore, Acting Director  
Environmental Services Division  
Metropolitan Council/Mears Park Centre  
230 East Fifth Street  
St. Paul, Minnesota 55101

RE: Notice of Noncompliance for June 5, 1995, Performance Test (Test) on Incinerator No. 10  
(Emission Point No. 6) Pursuant to Air Emission Permit No. 879-90-OT-3

Dear Mr. Madore:

The Air Quality Division (AQD) staff of the Minnesota Pollution Control Agency (MPCA) has reviewed the final test report (Report) for the June 5, 1995, test conducted on Incinerator No. 10 (Emission Point No. 6) at the Metropolitan Council Wastewater Services (Company) facility located in St. Paul, Minnesota.

AQD staff has determined that the Report demonstrates the following under Test conditions while combusting Natural Gas:

## SUMMARY OF PERFORMANCE TEST RESULTS

(Test Date: June 5, 1995)

Emission Unit Tested	Limitation Basis	Pollutant and Emission Limit	Test Result	Compliance Status
Incinerator No. 10	Minn. R. 7011 .1310 (A) & 40 CFR § 60.152 (a)(1)	<b>Particulate Matter:</b> 1.3 lb/dry ton sludge charged	1.86 lb/dry ton sludge charged* (1.96 lb/dry ton sludge charged based on total particulate catch)	Noncompliance
	Minn. R. 7011 .1310 (B) & 40 CFR § 60.152 (a)(2)	<b>Opacity:</b> Not to exceed 20 opacity	Maximum observed opacity reading was 10% and Highest 6-minute opacity readings was 10%	Compliance
Carbon Monoxide	Not Applicable	Not Applicable	520 ppm	Methodology Acceptable

\*Results include Dry Catch Only.

**In addition, please be advised of the following:**

1. The Enforcement Unit has been informed of the noncompliance status for particulate matter.
2. A retest will be required to determine compliance for particulate matter emissions.

Please be advised that upon receiving written notice of a second performance test failure, the Company will be required to either shut down the tested process unit(s) or to submit a compliance plan, subject to MPCA approval, which indicates how emissions will be minimized until compliance can be demonstrated. A second test failure will also be grounds for escalated enforcement action and a penalty assessment.

3. The Company shall comply with either of the following two options:

**OPTION A:**

- i. Conduct a retest for each of the pollutants identified in Item 1 on September 26, 1995, as indicated in a letter dated July 13, 1995, and in a follow up telephone conversation with Melba Hensel, of your staff, on August 7, 1995. Otherwise, the retest must be scheduled to occur on or before thirty (30) days after receipt of this letter.
- ii. Provide advance written notice of testing, submit a test plan and schedule a pretest meeting at least twenty-one (21) days prior to the retest date. The pretest meeting shall be held at least seven (7) working days prior to the date of the retest.
- iii. Submit the final performance test results to the Compliance Determination Unit (CDU) Supervisor within forty-five (45) days of conducting the retest. The cover letter shall indicate that the results are for a retest and that the retest was conducted due to a determination of noncompliance.
- iv. Include with the final test results a description of corrective action taken by the Company to achieve compliance. If AQD staff determine that compliance has been demonstrated, the Company shall incorporate this corrective action into its standard operating procedures.
- v. Submit a microfiche version of the final test report to CDU within one hundred and five (105) days of conducting the retest. A signed cover letter indicating that the content of the microfiche is a duplicate of the actual report must be sent with the microfiche. Microfiche copying services are available by contacting the State Department of Administration - Micrographics Services Unit at (612)779-5200. The complete permit number, complete facility name and the exact date of testing must be provided.



**OPTION B:**

- i. If the Company requires an extension to the retest schedule, the Company shall enter into a Schedule of Compliance with the MPCA. To do this, the Company must submit a written compliance plan which specifies the reason(s) why the extension is needed and a proposed alternative retest schedule. The compliance plan shall be submitted on or before thirty (30) days after the date of this letter. The plan also must include a detailed summary of the measures the Company will take to bring the affected unit(s) into compliance. The plan must also describe the mitigative actions the Company will take in the event the retest also documents noncompliance. The schedule shall include proposed dates for the pretest meeting and the submittal of final test results (refer to Option A, items ii through v, above). This plan will be incorporated into the Schedule of Compliance, which is signed by a Company official. The Schedule of Compliance requires the Company to pay a civil penalty if the plan is not followed and may also require additional corrective action. For the purpose of enforcing the emission limit, the period of noncompliance begins at the date of the performance test. Therefore, the Company should take measures to minimize emissions prior to receiving written notice of a performance test failure.

The tests were conducted while Incinerator No. 10 was operating at the rates listed below:

Test Date	Process Feed Rate	Control Equipment Operation Range	Control Equipment Operation Range
June 5, 1995	3.06 dry ton/hr sludge charged	QuadCyclone: 4.3-6.5" H <sub>2</sub> O Venturi: 27.4-30.7" H <sub>2</sub> O Sub-cooler: 6.0-7.8" H <sub>2</sub> O	Pre Cooler: 260-262 gpm Venturi: 263-264 gpm Sub Cooler: 1440-1571 gpm

Hearth No.	Average Operating Temperature	Minimum Operating Temperature
0	1316° F	1262° F
1	1284° F	1231° F
2	1573° F	1484° F
3	1687° F	1675° F
4	1490° F	1356° F
5	1364° F	1241° F

4. The following production operating limit applies pursuant to Minn. R. 7017.2025, subp. 3. This limit applies in addition to any operating limit or requirement that already exists and it does not serve to relax any limit or requirement except where prior authorization has been given by AQD staff.

Mr. Donald R. Madore  
Page Four  
August 30, 1995

Emission Unit	Production Limit	Averaging Method
Emission Point No. 6	3.1 dry cake tons per hour	Shift Basis: Maximum average daily sludge feed rate is determined by dividing total tons of sludge processed by total operating time in an eight hour shift. Down time of 15 or more minutes is not to be included as operating time.

**The Company may not operate an emission unit at a higher production rate than that listed in the above table unless it conducts a performance test at a higher rate and AQD staff determine compliance at that rate for the emission unit.**

**Note that when operating within the production limit above, the Company is still considered to be operating out of compliance until compliance has been determined by AQD staff following a retest.**

5. Note that the results of the retest will be used in conjunction with the results of this test in revising the set operating limits once compliance is determined by AQD staff. The retest should be conducted under the same operating capacity as this performance test. If the retest is conducted at a lower capacity, that will impact the operating limit.

#### **NOTICE**

You are hereby given notice that the above noncompliance has been documented by the MPCA. This Notice does not preclude the MPCA from taking further action with respect to the above noncompliance.

Please submit responses to this letter directly to:

Compliance Tracking Coordinator  
Compliance and Enforcement Section  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155-4194

Mr. Donald R. Madore  
Page Five  
August 30, 1995

If you have questions or comments regarding the content of this letter, please contact  
Craig Averman, of my staff, at (612)297-8301.

Your continued cooperation is appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael J. Sandusky", with a long horizontal flourish extending to the left.

Michael J. Sandusky  
Section Manager  
Compliance and Enforcement Section  
Air Quality Division

MJS:jeh

cc: Catherine Collins, U.S. EPA Region V  
Ann Seha, Attorney General's Office  
Todd Biewen, AQD  
Craig Averman, AQD  
Steve Giddings, AQD  
Hans Walter-Peterson, AQD  
Permit File No. 879-90-OT-3  
AQD File No. 879